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July 29, 2013

VIA E-MAIL

Michael Scarborough, Esq.
Sheppard Mullin Richter & Hampton LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation*,
Case No. 07-cv-5944-SC (N.D. Cal.)

Dear Michael:

This letter follows up on discovery responses from Samsung SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI (Malaysia) Sdn. Bhd., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., and Samsung SDI (Hong Kong), Ltd. (collectively, "Samsung SDI").

On March 12, 2010, the Direct Purchaser Plaintiffs served Samsung SDI with the Plaintiffs' Second Set of Requests for Production. Request No. 34 requested the production of "[a]ll Documents relating to . . . or received from any foreign governmental or legislative investigative body, including . . . the European Commission . . . or any law enforcement agency, authority or commission in any foreign country, relating to the sale, marketing, pricing, or distribution of CRT or CRT Products."

On December 5, 2012, the European Commission (EC) issued a press release announcing a fine of €1.47 billion to certain CRT producers, including Samsung SDI, for participation in CRT cartels that "operated worldwide." *See* European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes €1.47 billion for two decade-long cartels" (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm. Samsung SDI was directly fined €150.8 million for its illegal conduct.

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The Plaintiffs are aware that there is a non-public version of the EC's opinion to which the fined defendants, including Samsung SDI, have access. To date, Samsung SDI has objected and refused to produce any documents in response to Request No. 34. Samsung SDI's objections provide no basis for withholding plainly responsive documents, including the non-public decision. Plaintiffs therefore request that these documents be produced without delay or, if Samsung SDI will not do so, that Samsung SDI immediately provide dates and times for a meet-and-confer on this issue this week or early next week.

We look forward to your prompt response on this matter.

Sincerely,

R. Alexander Saveri

R. Alexander Saveri

cc: Tony Shapiro
Aaron Sheanin
Mario Alioto
Anne Nardacci
Craig A Benson